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July 29, 2022

By ECF

Hon. Naomi Reice Buchwald
United States District Judge
500 Pearl St.
New York, NY 10007-1312

RE: RINA OH n/k/a RINA OH AMEN, v. VIRGINIA L. GIUFFRE.
Case No.: 1:21-cv-08839-NRB

Dear Hon. Buchwald:

My office, Thomas Counselors at Law, LLC, along with my co-counsel, Paul G Cassell, Esq., represent the Defendant, Ms. Virginia Giuffre in the above-referenced matter. We submit this letter to the Court, after conferring with Plaintiff, as the first Joint Status Report for this Action.

On July 28, 2022, both parties met by teleconference to discuss discovery issues that have presented in this case. The parties agree that the discovery production will be more complex than originally anticipated.

As such, the parties have stipulated as follows:

- 1) Plaintiff will complete her initial document disclosures by August 19, 2022.
- 2) Both parties have served initial document and interrogatory requests. However, in accordance with the August 19, 2022 extension, both parties will hold in abeyance their discovery requests pending the completion of Plaintiff's initial document disclosures.
- 3) Parties stipulate to an extension of time to file a proposed confidentiality order to August 26, 2022.
- 4) Both parties will hold all information and documents produced in discovery as "confidential" and "attorneys-eyes only" until a confidential order has been issued in this action.
- 5) The parties anticipate that after plaintiff completes her initial disclosures on August 19, the parties will meet and confer about further revisions to the existing scheduling order in view of the complexities of the case.

We respectfully request that the Court accept this letter as the first Joint Status Report for this

Action.

We thank you for your attention to this matter.

Very truly yours,

_____/s/_____
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